

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party
Plaintiff.

Case No. 22-cv-10904 (JSR)

JP MORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

**DECLARATION OF FELICIA H. ELLSWORTH, ESQ.
IN SUPPORT OF DEFENDANT JPMORGAN CHASE BANK, N.A.’S MOTION FOR
ORDER AUTHORIZING ALTERNATIVE SERVICE OF SUBPOENA ON THIRD
PARTY CELESTINO A. WHITE, SR.**

I, Felicia H. Ellsworth, declare in support of Defendant, JPMorgan Chase Bank, N.A.’s (“JPMC”), Motion for Order Authorizing Alternative Service of Subpoena on Third Party Celestino A. White, Sr. as follows:

1. I am an attorney with Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”), counsel for JPMC, and am admitted to practice in the above-captioned matter.
2. On May 1, 2023, JPMC, by and through its counsel WilmerHale, issued a subpoena to Mr. White, requiring him to (i) produce certain documents and records and (ii) appear for an in-person deposition (the “Subpoena”).

3. WilmerHale worked with United States Virgin Islands (“USVI”) local counsel Kevin A. Rames to effect process of the Subpoena on Mr. White.
4. Mr. Rames was able to obtain Mr. White’s cell phone number and spoke with Mr. White on April 27, 2023. Mr. White informed Mr. Rames that he would cooperate with service by the process server at any time on or before May 7, 2023.
5. Mr. Rames was able to locate Mr. White’s last known address, and on four separate occasions, process server Marlon Richardson attempted service at that address.
6. As described further in the affidavit of Mr. Richardson, attached here as Exhibit 3, Mr. White actively evaded each of those attempts of personal service at that address.
7. Mr. White also failed to respond to multiple follow-up phone calls from Mr. Rames.
8. On May 8, 2023, Mr. Richardson contacted Mr. White, who informed him from the airport that he was heading out of USVI territory until May 23, 2023.
9. Mr. Rames has obtained Mr. White’s known email address and has been able to send correspondence to Mr. White within the last week.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 15th day of May 2023 at Boston, Massachusetts.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth